

**Megha Desai, OSB #141441
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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Case No. 3:24-cr-00099-AN-1

Plaintiff,

v.

KILEY JOHN BARGE,

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED
MOTION TO CONTINUE
TRIAL DATE**

Defendant.

I, Megha Desai, declare:

1. I am the attorney appointed to represent Kiley John Barge, in the above-entitled case.

2. A jury trial in this case is currently scheduled for April 30, 2024.

Mr. Barge was arraigned on March 15, 2024. No continuances have been sought by the defense.

3. Mr. Barge has not received discovery, and the defense is conducting investigation in his case, including obtaining information relating to circumstances of the offense and Mr. Barge's background. This information relates to pretrial litigation, trial, and sentencing. Mr. Barge therefore respectfully requests that this Court continue his case for a period of approximately 120 days or more to accomplish these tasks.

4. I have discussed with Mr. Barge his right to a speedy trial. He agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Nicole Bockelman has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on March 18, 2024, in Portland, Oregon.

/s/ Megha Desai
Megha Desai
Assistant Federal Public Defender